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6 **UNITED STATES DISTRICT COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA**

8
9 **STEPHEN CHAPMAN,**

10 **Plaintiff,**

11 v.

12 **HORACE MANN PROPERTY AND**
13 **CASUALTY INSURANCE COMPANY, et**
14 **al., |**

15 **Defendants.**
16

Case: 2:2 S 4-cv-10546-MWF-BFM
Judge: Honorable Judge Michael W.
Fitzgerald.

**NOTICE OF SUPPLEMENTAL
EVIDENCE RELATED TO DOCKET
ENTRY NO. 50, STAMPS.COM METER
POSTAGE DATA ON 12/5/2024, AND
12/6/2024, INCLUSIVE OF NOTABLE
RELATIVE EVIDENCE**

1 TO THE HONORABLE COURT AND ALL PARTIES:

2
3 Plaintiff Stephen Chapman, appearing in propria persona, respectfully submits this Notice of
4 Supplemental Evidence for the limited purpose of preserving the record and informing the Court
5 of newly obtained third-party metadata obtained pursuant to subpoena, evidencing material
6 inconsistencies in Defendant's service declarations. This submission is made pursuant to the duty
7 of candor under Federal Rule of Civil Procedure 11(b) and in light of prior guidance from the
8 Court concerning unsolicited supplemental filings.
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10 **I. BACKGROUND AND SUBPOENA EXECUTION**

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12 As Plaintiff has meticulously complied with FRCP 45 as evident is the record, see Dkt No. 50
13 this notice delivers upon Plaintiff's objectives in obtaining the targeted information.
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15 On May 28, 2025, Plaintiff caused a Rule 45 subpoena to be served upon Stamps.com, Inc.,
16 seeking production of postage meter usage data associated with specific meter numbers
17 registered to Freeman Mathis & Gary LLP ("FMG"). The subpoena requested print logs, user
18 credentials, and transmission metadata for all postage generated from November 2024 through
19 January 2025.
20

21
22 Stamps.com returned certified metadata logs for seven active meters used by FMG. A review of
23 that data shows:
24

- 25 • No postage was generated by any FMG-registered meter on or before December 6, 2024,
26 despite Defendant's sworn declarations asserting service occurred on December 5, 2024.
27
28

- 1 • No documents match the postage costs reflected in the evidence provided by the
2 Defendant on record, See ECF No. 1-3 Exh B-26.
- 3 • For example, **Meter No. 2832848**—associated with the Miami office—did not print
4 postage until **December 11, 2024 at 7:16 AM PT**, contradicting the sworn Proof of
5 Service claiming mail service occurred on **December 5 and 6th, 2024**: See Defendant
6 Horace Mann's Opposition to Plaintiff's Motion to Remand, [Docket No. 34], at 4, lines
7 7-12, '*...December 6, 2024.. Plaintiff was provided with courtesy copies of all removal*
8 *documents filed in this Court that same day, along with a note that "Hard copies will*
9 *follow via U.S. Mail" and a list of all the documents (the hard copies were, in fact,*
10 *served by mail that same day)*¹. (Emphasis added)
- 11 • Other meters, including Nos. 9796027 (Georgia), 2690676 (Ft. Lauderdale), and
12 10264564 (Los Angeles), show similar inactivity on or before December 5–6, 2024.

13 This metadata confirms that the filings were not timely served, and that declarations submitted
14 by Defendant contain false factual assertions, which appear to have been made knowingly.

15 **II. PROCEDURAL SIGNIFICANCE²**

16 Under **FRCP 5(b)(2)(C)**, service by mail is effective only upon actual mailing.

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25 ¹ Not only are the claims made by defendants demonstrably false and impeached by the
26 Stamps.com Data; but also, even without the stamps.com data, the Defendant is admitting having "served" by mail
27 unstamped documents that cannot be validated; this was nothing more than as a sloppy hail Mary by Defendants,
28 attempting to preempt their inevitable failure by not meeting the 30-day statutory deadline to file the NOR which
expired December 8. **This is now fact** – PACER records confirm an attempt to open the case in federal court was
tried at 5:08 PM yet failed – past postal hours (in case that isn't clear)

² This notice is filed without prejudice and without requesting affirmative relief at this time.
Plaintiff reserves the right to pursue sanctions and further judicial remedies in subsequent filings.

1 Under **28 U.S.C. § 1446(d)**, removal is effectuated only when a copy of the notice is both filed in
2 federal court and served upon all adverse parties.

3
4 The evidence now fully supports Plaintiff's longstanding objections that were never substantiated
5 against by the defendants yet taken at their word – now proven, **no valid mailing or service**
6 **occurred prior to the December 8, 2024 removal deadline**. This late mailing—undisclosed to
7 the Court—raises serious questions under **FRCP 11(b)(3)** (representations to the Court lacking
8 evidentiary support) and **FRCP 60(d)(3)** (fraud on the Court).

9
10 Additional evidence relevant to the subject matter stated within the context and purposes of this
11 notice that should be entered into the record attached hereto includes:
12

- 13 1. Copy of CMC (CM-110) filed in state court ¶2 at *2 Amount in controversey, in direct
14 contrast to def's misrepresentation of the plaintiff and the discussion recap in ECF 34-2.
- 15 2. Plaintiff's preserved objections to improper service and docket tampering/obstruction³
- 16 3. Copy of intermittent changes to the plaintiff's address randomly captured reflected on the
17 record.
- 18 4. Stamps.com meter metadata contradicting declared mailing dates.
- 19 5. Copy of Plaintiff's Declaration See Docket 12, pp. 1-[2-5]; Defendant's recklessly
20 misrepresent the Plaintiff's declaration to be in direct contrast with the Plaintiff's
21 statements, See ECF 34 at 3 pp. 12-2.
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28 ³ Side by side comparison of docket at different months revealing inconsistencies in plaintiffs
address that appear intermittently.

6. Also, for the record while we are here, the Defendant's NOR did not cause the court to stay – it's laudable because it appears they truly believe this or true to form, they misrepresent the posture.

1. Special Stay was entered due to Plaintiff's request to the court to Stay which was made on 12.28.2024 and hearing scheduled for 3.18.2025; then subsequently changed to grant leave and slightly sooner date of 3.13.2025; this can further be determined as the court entered into Special State BEFORE defendants served the NOR as reflected in the docket. Moreover, on 01.14.2025, the court scheduled, ordered and served both parties to appear on 3.13.2025 advancing CMC to that same day of the Motion Hearing. However, the Defendant's argued against my attempts to meet and confer over the CMC requirements and misrepresented the case as removed and no such hearing would happen – yet they appeared.

III. LODGMENT AND CONFIDENTIALITY

Plaintiff attaches a redacted and consolidated (3 sheets) version of the meter activity, location, and relevant use summary as **Exhibit 1**, demonstratively limited to metadata necessary to support this notice. To preserve privacy and comply with **Local Rule 79-5**, Plaintiff is prepared to lodge the full production under seal in compliance with Local Rule 79-5, and to make them available for in camera review at the Court's discretion.

III. APPENDIX – POSTAGE PRINTING RECORDS (Excerpts/High Level Insights)

Meter #	User Name	Print Date (PT)	Origin ZIP	Notes
2832848	JMcMxxxxFMG	12/11/2024 07:16 AM	33156	No record of alledged activity 12/5/2024-12/06/2024

9796027	CMxxxxxxx462	12/12/2024 (multiple)	32751	No 12/5/2024-12/06/2024 activity
2690676	KMcxxxxxFMG	12/11/2024 13:49–15:13	33301	No 12/5/2024-12/06/2024 activity
10482036	HB Office	N/A	N/A	No postage dated 12/5/2024-12/06/2024 recovered
10264564	Wxxxxx Hxxxx	N/A	90071	No postage dated 12/5/2024-12/06/2024 recovered

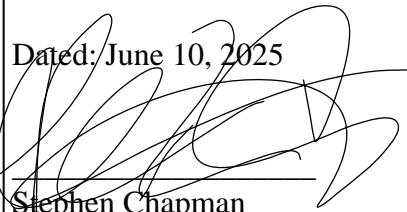
IV. CONCLUSION

The Plaintiff includes all data provided by Stamps.com consolidated per their respective categories “log In” “Account” “Print/Orders” in a single document comprised of the 3 sheets, total, to preserve the privacy of names and other sensitive details which have been redacted from the public record. However, upon the Court’s request, the Plaintiff will lodge under seal all seven Excel files produced by Stamps.com, consistent with the confidentiality requirements of Local Rule 79-5 and subject to in camera inspection if necessary.

Plaintiff provides this information for record integrity and reserves all rights to further relief upon motion. A true and correct copy of the subpoena return and relevant envelope images are available for judicial inspection upon request.

Respectfully submitted,

Dated: June 10, 2025


 Stephen Chapman
 Plaintiff, In Propria Persona

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DECLARATION

Stephen Chapman In Pro Se
7917 Selma Ave 336
Los Angeles CA 90046
619-550-7543
StefinChapman@outlook.com

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

STEPHEN CHAPMAN,

Plaintiff,

v.

**HORACE MANN PROPERTY AND
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al., |**

Defendants.

Case: 2:2 S 4-cv-10546-MWF-BFM
Judge: Honorable Judge Michael W.
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**DECLARATION OF STEPHEN
CHAPMAN RE: FALSIFIED SERVICE
EVIDENCE AND DOCKET TIMELINE
INCONSISTENCIES**

I, Stephen Chapman, declare as follows:

1. I am the Plaintiff in the above-captioned matter, appearing in propria persona. I make this declaration based on personal knowledge and upon review of court records, electronic filing metadata, and certified documents produced in response to a Rule 45 subpoena issued to Stamps.com.
2. On May 28, 2025, I caused a subpoena to be served on Stamps.com, requesting postage print logs and metadata associated with postage meters registered to Freeman Mathis & Gary LLP, including but not limited to meters 62S0001443186, 063S0001443221, 063S0014950427, and 06380001443103. These meters were selected based on their

1 association with specific attorneys, FMG personnel, and offices believed to be
2 responsible for mailing documents to Plaintiff’s address. Stamps.com ultimately
3 identified and returned records for seven active meters used by FMG during the period
4 from November 2024 through January 2025.

- 5
6 3. The data returned by Stamps.com confirms that multiple key filings in this matter—
7 namely, the **Answer, Notice of Removal, Initial Civil Cover Sheet, Rule 26(f) Report,**
8 and each related **proofs of service and affidavit** —were *not* mailed, served, or filed on
9 the dates declared by defense counsel, and in some instances, **not until days after the**
10 **court docket reflects them as filed.**

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13 **I. FEDERAL PROCEDURAL AND STATUTORY REQUIREMENTS**

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15 4. Under **Federal Rule of Civil Procedure 5(b)(2)(C)**, service by mail is effective only
16 upon actual mailing.
17 5. Under **FRCP 5(d)(1)**, any document that is served must be filed “within a reasonable
18 time” thereafter.
19 6. Under **28 U.S.C. § 1446(d)**, a Notice of Removal must be filed in federal court, served
20 upon all adverse parties, and filed in the state court **promptly** to effectuate removal.
21 7. **FRCP 81(c)(2)** requires a responsive pleading to be served within 7 days of the Notice of
22 Removal.
23 8. Filing by CM/ECF must comply with **Local Rule 5-4.3.1**, which limits electronic filing
24 credentials to attorneys of record and authorized registered users.
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26
27 **II. OBJECTIVE TIMELINE AND METADATA EVIDENCE**
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- 1 9. Defendants filed a **Notice of Removal** plus attachments on **Friday, December 6, 2024**,
2 with PACER reflecting the Notice filed at **5:08 PM**, followed by the Notice of Interested
3 Parties at **5:11 PM** that same evening.
- 4 10. The Notice of Removal included an Answer dated **December 5, 2024**, accompanied by a
5 declaration of service stating that the Answer was served on Plaintiff by both email and
6 mail on **December 5, 2024**.
- 7 11. However, the Stamps.com metadata tied to **Meter No. 2832848**, associated with FMG's
8 Miami office, shows that a First-Class envelope bearing **\$0.97 in postage** was not printed
9 until **December 11, 2024, at 7:16 AM PT**. No envelope was generated or mailed on
10 December 5 or 6 from that meter.
- 11 12. Similarly, metadata from meters **9796027, 11458496, 10264564, 10264565, 10482036**,
12 and **2690676** confirms that no documents were printed or mailed from any FMG office
13 on December 5 or 6, 2024.
- 14 13. These meters represent FMG offices in Los Angeles, Miami, Atlanta, Ft. Lauderdale, and
15 El Segundo—collectively encompassing every office tied to filings in this action.
- 16 14. Accordingly, **no valid mailing of the Answer, Notice of Removal, or any of their**
17 **attachments or enclosures occurred on or before December 5–6, 2024**, and therefore
18 service was legally ineffective until **December 11, 2024** at the earliest—after the
19 statutory 30-day removal deadline of December 8, 2024, had expired.
- 20 15. I have consistently maintained, and now substantiated with verified evidence, that I never
21 received any valid copy of the Answer or Notice of Removal ("+ attachments") as
22 argued, described, and declared by Defendants. The evidence establishes that no such
23 service or filing could have lawfully or physically occurred until after December 11,
24 2024.
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1 16. As the Plaintiff, I have been forced to argue against false declarations and presumed
2 timelines, all while denied procedural fairness, due process, and access to a neutral
3 record. The metadata now confirms, with third-party authority, what I have represented to
4 the Court since the outset.

5 17. Consolidated pages of postage meter print logs for each of the seven FMG-registered
6 meters is appended hereto as **Exhibit 101**. Full metadata reports are available to the
7 Court for in camera inspection or submission under seal, pursuant to **Local Rule 79-5**
8 and **FRCP 26(c)**, to protect sensitive digital signatures and transmission data embedded
9 in the subpoena return.
10

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

13 Executed on this 10 day of June 2025 in Los Angeles, CA,
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16 **Stephen Chapman Plaintiff, In Pro Se**
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Exhibit 1

Stamps.com Data

see Dkt 50

Customer Information - N[REDACTED]

Meter Number: [REDACTED]
Company Name: Freeman Mathis and Gary, LLP

Print Details

Print Date (PT)	Print Type	Mail Class	Mail Type	Cubic Pricing	Postage (\$)	Confirmation Number
12/11/2024 3:13:48 PM	NetStamp	First Class	Envelope		\$10.20	
12/11/2024 1:49:19 PM	NetStamp	First Class	Envelope		\$0.69	
12/11/2024 1:48:50 PM	NetStamp	First Class	Envelope		\$9.92	
12/11/2024 1:48:24 PM	NetStamp	First Class	Envelope		\$10.20	

Customer Information - N[REDACTED]

Meter Number: [REDACTED]
Company Name: Freeman Mathis and Gary, LLP

Print Details

Print Date (PT)	Print Type	Mail Class	Mail Type	Cubic Pricing	Postage (\$)	Confirmation Number
12/11/2024 7:16:21 AM	NetStamp	First Class	Envelope		\$0.97	
12/3/2024 9:00:16 AM	NetStamp	First Class	Envelope (Non-Standard)		\$3.43	
12/3/2024 8:59:58 AM	NetStamp	First Class	Envelope (Non-Standard)		\$3.43	
12/3/2024 8:59:45 AM	NetStamp	First Class	Envelope (Non-Standard)		\$3.43	
12/3/2024 8:59:25 AM	NetStamp	First Class	Envelope (Non-Standard)		\$3.43	

Customer Information - T[REDACTED]

Meter Number: 9[REDACTED]
Company Name: Freeman Mathis and Gary, LLP

Print Details

Print Date (PT)	Print Type	Mail Class	Mail Type	Cubic Pricing	Postage (\$)	Confirmation Number
12/12/2024 12:19:05 PM	Shipping Label	Ground Advantage	Package	No Cubic Pricing	\$5.50	9400111899561549662725
12/12/2024 10:41:26 AM	Internet Postage	First Class	Envelope	No Cubic Pricing	\$0.69	00040899560516423426
12/12/2024 10:06:34 AM	Shipping Label	First Class	Envelope (Non-Standard)	No Cubic Pricing	\$2.04	00040899560516491569
12/12/2024 6:08:09 AM	Internet Postage	First Class	Envelope	No Cubic Pricing	\$9.64	00040899560516487404
12/10/2024 6:56:44 AM	NetStamp	First Class	Envelope (Non-Standard)		\$2.31	
12/10/2024 6:55:43 AM	NetStamp	First Class	Envelope (Non-Standard)		\$2.04	
12/10/2024 6:55:43 AM	NetStamp	First Class	Envelope (Non-Standard)		\$2.04	
12/10/2024 6:42:01 AM	NetStamp	First Class	Envelope		\$9.64	
12/10/2024 6:39:46 AM	NetStamp	First Class	Envelope		\$0.69	
12/6/2024 12:56:48 PM	NetStamp	First Class	Envelope		\$0.69	
12/6/2024 12:56:30 PM	NetStamp	First Class	Envelope		\$0.69	
12/4/2024 11:49:18 AM	NetStamp	First Class	Envelope		\$0.69	
12/4/2024 11:49:18 AM	NetStamp	First Class	Envelope		\$0.69	
12/4/2024 11:49:18 AM	NetStamp	First Class	Envelope		\$0.69	
12/4/2024 11:49:18 AM	NetStamp	First Class	Envelope		\$0.69	
12/4/2024 11:49:18 AM	NetStamp	First Class	Envelope		\$0.69	
12/4/2024 11:49:18 AM	NetStamp	First Class	Envelope		\$0.69	
12/4/2024 11:49:18 AM	NetStamp	First Class	Envelope		\$0.69	
12/4/2024 11:49:18 AM	NetStamp	First Class	Envelope		\$0.69	
12/4/2024 11:49:18 AM	NetStamp	First Class	Envelope		\$0.69	
12/4/2024 11:49:18 AM	NetStamp	First Class	Envelope		\$0.69	

Recipient Address	Return Address	Weight Category	Weight (lbs/oz)	Originating Zip Code
		0.5	0 lb 1 oz	33301
		0.5	0 lb 1 oz	33301
		0.5	0 lb 1 oz	33301
		0.5	0 lb 1 oz	33301

Recipient Address	Return Address	Weight Category	Weight (lbs/oz)	Weight (numeric)
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625

Recipient Address	Return Address	Weight Category	Weight (lbs/oz)	Weight (numeric)
[REDACTED]	[REDACTED]	1	0 lb 10 oz	0.6250
[REDACTED]	[REDACTED]	0.5	0 lb 1 oz	0.0625
[REDACTED]	[REDACTED]	0.5	0 lb 3 oz	0.1875
[REDACTED]	[REDACTED]	0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625
		0.5	0 lb 1 oz	0.0625

Destination Zip Code	Destination Country	User Name	Cubic Length	Cubic Width	Cubic Height
		JMcM[REDACTED]FMG			
		JMcM[REDACTED]FMG			
		JMcM[REDACTED]FMG			
		JMcM[REDACTED]FMG			

Originating Zip Code	Destination Zip Code	Zone	Destination Country	User Name	Cubic Length	Cubic Width	Cubic Height
33156				[REDACTED]			
33156				[REDACTED]			
33156				[REDACTED]			
33156				[REDACTED]			
33156				[REDACTED]			

Originating Zip Code	Destination Zip Code	Zone	Destination Country	Cubic Length	Cubic Width	Cubic Height	User Name
32751	42728	5		12	1	8	[REDATED]
32751	33605	2					[REDATED]
32751	34471	2					[REDATED]
32751	30265	4					[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]
30297							[REDATED]

date_time	ipaddress	ip Geolocation	Column1	credentialstatus	username	PI Compliant username2
12/11/2024	[REDACTED] ->	unknown		Valid	JMcM[REDACTED]FMG	KMc[REDACTED]FMG
12/11/2024	[REDACTED] ->	Pennsylvania		Valid	JMcM[REDACTED]FMG	KMc[REDACTED]FMG
12/11/2024	[REDACTED] ->	Pennsylvania		Valid	JMcM[REDACTED]FMG	KMc[REDACTED]FMG
12/11/2024	[REDACTED] ->	Pennsylvania		Valid	JMcM[REDACTED]FMG	KMc[REDACTED]FMG
12/11/2024	[REDACTED] ->	Pennsylvania		Valid	JMcM[REDACTED]FMG	KMc[REDACTED]FMG
12/11/2024	[REDACTED] ->	Pennsylvania		Valid	JMcM[REDACTED]FMG	KMc[REDACTED]FMG
12/11/2024	[REDACTED] ->	unknown		Valid	JMcM[REDACTED]FMG	KMc[REDACTED]FMG
12/11/2024	[REDACTED] ->	unknown		Valid	JMcM[REDACTED]FMG	KMc[REDACTED]FMG
12/11/2024	[REDACTED] ->	unknown		Valid	JMcM[REDACTED]FMG	KMc[REDACTED]FMG
12/11/2024	[REDACTED] ->	Pennsylvania		Valid	JMcM[REDACTED]FMG	KMc[REDACTED]FMG
date_time	ipaddress			credentialstatus	username	username
12/10/2024	[REDACTED] ->	Georgia		Valid	[REDACTED] ->	FMGLAW-[REDACTED]
date_time	ipaddress			credentialstatus	username	username
12/11/2024	[REDACTED] ->	Texas		Valid	[REDACTED] ->	JMcM[REDACTED]FMG
12/3/2024	[REDACTED] ->	Texas		Valid	[REDACTED] ->	JMcM[REDACTED]FMG
date_time	ipaddress			credentialstatus	username	username
12/12/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/12/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/12/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/12/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/12/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/12/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/12/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/12/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/12/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/11/2024	[REDACTED] ->	unknown		Valid	[REDACTED] ->	CM[REDACTED]I462.
12/11/2024	[REDACTED] ->	unknown		Valid	[REDACTED] ->	CM[REDACTED]I462.
12/10/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/9/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/9/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/9/2024	[REDACTED] ->	unknown		Valid	[REDACTED] ->	CT[REDACTED]661.
12/9/2024	[REDACTED] ->	unknown		Valid	[REDACTED] ->	CT[REDACTED]661.
12/6/2024	[REDACTED] ->	Kansas		Valid	[REDACTED] ->	NW[REDACTED]r756
12/6/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/6/2024	[REDACTED] ->	unknown		Valid	[REDACTED] ->	CM[REDACTED]I462.
12/6/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/6/2024	[REDACTED] ->	unknown		Valid	[REDACTED] ->	CM[REDACTED]I462.
12/6/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/5/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/5/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/5/2024	[REDACTED] ->	unknown		Valid	[REDACTED] ->	CM[REDACTED]I462.
12/5/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/4/2024	[REDACTED] ->	Kansas		Valid	[REDACTED] ->	TG[REDACTED]529
12/4/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
12/3/2024	[REDACTED] ->	Virginia		Invalid	[REDACTED] ->	Stamps_654[REDACTED]
date_time	ipaddress			credentialstatus	username	username
12/9/2024	[REDACTED] ->	Georgia		Valid	[REDACTED] ->	NB[REDACTED]#
12/5/2024	[REDACTED] ->	Georgia		Valid	[REDACTED] ->	NB[REDACTED]#
12/2/2024	[REDACTED] ->	Georgia		Valid	[REDACTED] ->	NB[REDACTED]#
12/2/2024	[REDACTED] ->	Georgia		Valid	[REDACTED] ->	NB[REDACTED]#
12/2/2024	[REDACTED] ->	Georgia		Valid	[REDACTED] ->	NB[REDACTED]#

Account Name	[REDACTED]
Other Name	[REDACTED]
Meter #	[REDACTED]
DATE OPENED	5/23/2024
Billing Name	Ft. Lauderdale Office
Billing Address	100 Galleria Parkway Suite 1600. Atlanta, GA, 30339
Mailing Address	301 E. Las Olas Blvd., Suite 250. Ft. Lauderdale, FL, 33301
Physical Address	301 E. Las Olas Blvd., Suite 250. Ft. Lauderdale, FL, 33301
Company Name	Freeman Mathis & Gary LLP
Meter Email Address	[REDACTED]
Other Email	[REDACTED]
Phone #	[REDACTED]

<u>Account Name</u>	<u>[REDACTED]</u>
<u>Meter #</u>	<u>[REDACTED]</u>
<u>DATE OPENED</u>	<u>10/30/2017</u>
<u>Billing Name</u>	<u>[REDACTED]</u>
<u>Billing Address</u>	<u>100 Galleria Parkway Suite 1600. Atlanta, GA, 30339</u>
<u>Mailing Address</u>	<u>100 Galleria Parkway. Atlanta, GA, 30339</u>
<u>Physical Address</u>	<u>550 S Hope Street Ste 2200. Los Angeles, CA, 90071</u>
<u>Company Name</u>	<u>Freeman Mathis & Gary, LLP</u>
<u>Meter Email Address</u>	<u>[REDACTED]</u>
<u>Phone #</u>	<u>[REDACTED]</u>

Account Name	[REDACTED]
Other Name	[REDACTED]
Meter #	[REDACTED]
DATE OPENED	8/13/2024
Billing Name	Miami Office
Billing Address	100 Galleria Parkway Suite 1600. Atlanta, GA, 30339
Mailing Address	9130 South Dadeland Blvd, Suite 200. Miami, FL, 33156
Physical Address	9130 South Dadeland Blvd, Suite 200. Miami, FL, 33156
Company Name	FREEMAN MATHIS & GARY, LLP
Meter Email Address	[REDACTED]
Other Email	[REDACTED]
Phone #	[REDACTED]

Account Name	[REDACTED]
Other Name	[REDACTED]
Meter #	[REDACTED]
DATE OPENED	3/11/2016
Billing Name	Forest Park Office
Billing Address	100 Galleria Parkway Suite 1600. Atlanta, GA, 30339
Mailing Address	661 Forest Parkway, Suite E. Forest Park, GA, 30297

Physical Address	661 Forest Parkway, Suite E. Forest Park, GA, 30297
Company Name	Freeman Mathis & Gary
Meter Email Address	[REDACTED]
Other Email	[REDACTED]
Phone #	[REDACTED]

Username	Name	Email
[REDACTED]	Tracie G	[REDACTED]
[REDACTED]	Chelsea M	[REDACTED]
[REDACTED]	Nyaijah W	[REDACTED]
[REDACTED]	Cynthia T	[REDACTED]

Account Name	EW
Other name	[REDACTED]
Meter #	[REDACTED]
DATE OPENED	2/28/2019
Billing Name	El Segundo Office
Billing Address	100 Galleria Parkway Suite 1600. Atlanta, GA, 30339
Mailing Address	1960 E GRAND AVE. EL SEGUNDO, CA, 90245
Physical Address	1960 E GRAND AVE STE 810. EL SEGUNDO, CA, 90245
Company Name	Freeman Mathis & Gary, LLP
Meter Email Address	[REDACTED]
Other Email	[REDACTED]
Phone #	[REDACTED]
Username	HB Office

Account Name	NB
Meter #	[REDACTED]
DATE OPENED	3/12/2018
Billing Name	Atlanta Office
Billing Address	100 Galleria Parkway Suite 1600. Atlanta, GA, 30339
Mailing Address	100 Galleria Parkway Suite 1600. Atlanta, GA, 30339
Physical Address	100 Galleria Parkway Suite 1600. Atlanta, GA, 30339
Company Name	Freeman Mathis & Gary, LLP
Meter Email Address	[REDACTED]
Phone #	[REDACTED]

Account Name	EC
Meter #	[REDACTED]
DATE OPENED	10/30/2017
Billing Name	WH [REDACTED]
Billing Address	100 Galleria Parkway Suite 1600. Atlanta, GA, 30339
Mailing Address	100 Galleria Parkway Suite 1600. Atlanta, GA, 30339
Physical Address	100 Galleria Parkway Suite 1600. Atlanta, GA, 30339

Company Name	Freeman Mathis & Gary, LLP
Meter Email Address	[REDACTED]
Other Email	[REDACTED]
Phone #	[REDACTED]

Exhibit 1.1

One Legal Proof of Service
Subpoea

STEPHEN CHAPMAN

7917 Selma Ave #336

Los Angeles, CA 90046

619-550-7543

Representing: In Pro Per

File No.

UNITED STATES DISTRICT COURT

Central District of California - District - Los Angeles - First Street

Stephen Chapman

Plaintiff/Petitioner

VS.

Horace Mann Property & Casualty Insurance Company, et al)

Defendant/Respondent

Case No. 2:24-cv-10546-MWF(BFM)

Proof of Service of:

Subpoena to Produce Documents, Information, or Objects or

to Permit Inspection of Premises in a Civil Action

Service on:

STAMPS.COM

Hearing Date:

Hearing Time:

Div/Dept:

PROOF OF SERVICE

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) STEPHEN CHAPMAN 7917 Selma Ave #336 Los Angeles, CA 90046 TELEPHONE NO: 619-550-7543 FAX NO (Optional): E-MAIL ADDRESS (Optional): Stephen@chapmanmed.com ATTORNEY FOR (Name): In Pro Per		FOR COURT USE ONLY
Insert name of court, judicial district or branch court, if any: United States District Court Central District of California - District - Los Angeles - First Street 350 W. First Street Los Angeles, CA 90012		
PLAINTIFF / PETITIONER: Stephen Chapman DEFENDANT / RESPONDENT: Horace Mann Property & Casualty Insurance Company, et al		CASE NUMBER: 2:24-cv-10546-MWF(BFM)
HEARING DATE:	HEARING TIME:	HEARING LOCATION:
PROOF OF SERVICE		Ref. No. or File No.: 13389007 (25459640)

1. At the time of service I was a citizen of the United States, over 18 years of age and not a party to this action, and I served copies of:
 Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

2. Party Served: STAMPS.COM by serving Alex Jenkins — CSC Lawyers Incorporating Service - Agent for Service

3. Date & Time of Delivery: May 28, 2025 at 1:26 pm PDT

4. Address, City and State: 2710 Gateway Oaks Drive Suite 150N Sacramento, CA, 95833

5. I received the above document(s) for service on: May 23, 2025

6. Witness Fees: Witness fees and mileage both ways were not demanded or paid.

Fee for service: \$50.00

Registered California process server.
 Brandon Ortiz
 County: Sacramento
 Registration No.: 2012-037

InfoTrack US, Inc. - P000634
 1400 North McDowell Blvd Suite 300,
 Petaluma, CA 94954
 800-938-8815

I declare under penalty of perjury under the laws of the United States of
 America and the State of California that the foregoing is true and correct.



Brandon Ortiz

Date: June 9, 2025

PROOF OF SERVICE

Exhibit 2

Intermittent Docket Appearance of
Address inconsistencies "No 336"

ACCO,(BFMx),DISCOVERY,MANADR

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA (Western Division - Los Angeles)
CIVIL DOCKET FOR CASE #: 2:24-cv-10546-MWF-BFM

Stephen Chapman v. Horace Mann Property and Casualty Insurance Company
Assigned to: Judge Michael W. Fitzgerald
Referred to: Magistrate Judge Brianna Fuller Mircheff
Demand: \$75,000
Case in other court: County of Los Angeles, 24STCV27909
Cause: 28:1441 Notice of Removal - Breach of Contract

Date Filed: 12/06/2024
Jury Demand: None
Nature of Suit: 110 Insurance
Jurisdiction: Diversity

Plaintiff

Stephen Chapman

represented by Stephen Chapman
7917 Selma Ave No 336
Los Angeles, CA 90046
619-550-7543
PRO SE

V.

Defendant

Horace Mann Property and Casualty Insurance Company

represented by Kristin A Ingulsrud
Freeman Mathis and Gary, LLP
550 South Hoper Street Suite 2200
Los Angeles, CA 90071
213-615-7000
Fax: 833-264-2083
Email: kristin.ingulsrud@fmglaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Marc J. Shrake
Freeman Mathis and Gary LLP
550 South Hope Street Suite 2200
Los Angeles, CA 90071-2627
213-615-7000
Fax: 833-264-2083
Email: mshrake@fmglaw.com
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
12/06/2024	<u>1</u>	NOTICE OF REMOVAL from County of Los Angeles, case number 24STCV27909 Receipt No: ACACDC-38712961 - Fee: \$405, filed by Defendant HORACE MANN PROPERTY & CASUALTY INSURANCE COMPANY. (Attachments: # <u>1</u> Civil Cover

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA (Western Division - Los Angeles)
CIVIL DOCKET FOR CASE #: 2:24-cv-10546-MWF-BFM

Stephen Chapman v. Horace Mann Property and Casualty Insurance Company
Assigned to: Judge Michael W. Fitzgerald
Referred to: Magistrate Judge Brianna Fuller Mircheff
Demand: \$75,000
Case in other court: County of Los Angeles, 24STCV27909
Cause: 28:1441 Notice of Removal - Breach of Contract

Date Filed: 12/06/2024
Jury Demand: None
Nature of Suit: 110 Insurance
Jurisdiction: Diversity

Plaintiff

Stephen Chapman

represented by Stephen Chapman
7917 Selma Ave 336
Los Angeles, CA 90046
619-550-7543
Email: stefinchapman@outlook.com
PRO SE

V.

Defendant

Horace Mann Property and Casualty Insurance Company

represented by Kristin A Ingulsrud
Freeman Mathis and Gary, LLP
550 South Hoper Street Suite 2200
Los Angeles, CA 90071
213-615-7000
Fax: 833-264-2083
Email: kristin.ingulsrud@fmglaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Marc J. Shrake
Freeman Mathis and Gary LLP
550 South Hope Street Suite 2200
Los Angeles, CA 90071-2627
213-615-7000
Fax: 833-264-2083
Email: mshrake@fmglaw.com
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
12/06/2024	<u>1</u>	NOTICE OF REMOVAL from County of Los Angeles, case number 24STCV27909 Receipt No: ACACDC-38712961 - Fee: \$405, filed by Defendant HORACE MANN PROPERTY & CASUALTY INSURANCE COMPANY. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Declaration Declaration of Matthew Rubin, # <u>3</u> Declaration Declaration of

Exhibit 3

Amount in Controversy
Opposition to Defendants Declaration ECF
34-2

PLAINTIFF/PETITIONER: Stephen Chapman	CASE NUMBER:
DEFENDANT/RESPONDENT: Horace Mann Property and Casualty Insurance Company	STCV27909

4. b. Provide a brief statement of the case, including any damages (*if personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date [indicate source and amount], estimated future medical expenses, lost earnings to date, and estimated future lost earnings; if equitable relief is sought, describe the nature of the relief*): Pursuant to CCP § 425.10(b), Plaintiff is not required to specify an amount of damages at this time. However, Plaintiff estimates that damages will not exceed \$74,999 and seeks damages according to proof presented at trial. This statement does not preclude Plaintiff from seeking any and all damages to which he may be legally entitled, including but not limited to equitable relief, statutory damages, punitive damages, or any additional relief the Court deems just and proper.

☐ (If more space is needed, check this box and attach a page designated as Attachment 4b.)

5. **Jury or nonjury trial**

The party or parties request ☒ a jury trial ☐ a nonjury trial. (If more than one party, provide the name of each party requesting a jury trial):

6. **Trial date**

a. ☐ The trial has been set for (date):

b. ☒ No trial date has been set. This case will be ready for trial within 12 months of the date of the filing of the complaint (if not, explain):

c. Dates on which parties or attorneys will not be available for trial (specify dates and explain reasons for unavailability):

7. **Estimated length of trial**

The party or parties estimate that the trial will take (check one)

a. ☒ days (specify number): 7-10

b. ☐ hours (short causes) (specify):

8. **Trial representation (to be answered for each party)**

The party or parties will be represented at trial ☒ by the attorney or party listed in the caption ☐ by the following:

a. Attorney:

b. Firm:

c. Address:

d. Telephone number:

f. Fax number:

e. Email address:

g. Party represented:

☐ Additional representation is described in Attachment 8.

9. **Preference**

☐ This case is entitled to preference (specify code section):

10. **Alternative dispute resolution (ADR)**

a. **ADR information package.** Please note that different ADR processes are available in different courts and communities; read the ADR information package provided by the court under rule 3.221 of the California Rules of Court for information about the processes available through the court and community programs in this case.

(1) For parties represented by counsel: Counsel ☐ has ☐ has not provided the ADR information package identified in rule 3.221 to the client and reviewed ADR options with the client.

(2) For self-represented parties: Party ☒ has ☐ has not reviewed the ADR information package identified in rule 3.221.

b. **Referral to judicial arbitration or civil action mediation (if available).**

(1) ☐ This matter is subject to mandatory judicial arbitration under Code of Civil Procedure section 1141.11 or to civil action mediation under Code of Civil Procedure section 1775.3 because the amount in controversy does not exceed the statutory limit.

(2) ☐ Plaintiff elects to refer this case to judicial arbitration and agrees to limit recovery to the amount specified in Code of Civil Procedure section 1141.11.

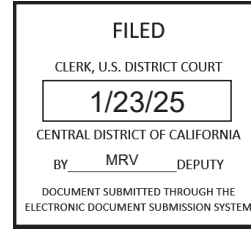
(3) ☐ This case is exempt from judicial arbitration under rule 3.811 of the California Rules of Court or from civil action mediation under Code of Civil Procedure section 1775 et seq. (specify exemption):

California Rules of Court, Rule 3.811(b); (b)(8); (b)(6) may be subject to change.

Exhibit 4

Evidence demonstrates and confirms claims that
support the plaintiff's motion to strike

1 **Stephen Chapman**
2 7917 Selma Ave 336
3 Los Angeles CA 90046
4 619-550-7543
5 StefinChapman@outlook.com
6 Plaintiff Pro Se



8 STEPHEN CHAPMAN,

10 Plaintiff(s),

12 vs.

14 HORACE MANN PROPERTY AND
15 CASULTY INSURANCE
16 COMPANY, and **RAYMOND**
17 **PRUITT.**

18 Defendant(s).

Case No.: **2:24-CV-10546-MWF-BFM**
Judge: Honorable Michael Fitzgerald

**DECLARATION OF STEPHEN
CHAPMAN**

20 **Declaration of Stephen Chapman**

21 I, Stephen R. Chapman, declare as follows:

- 22
- 23 1. I am the Plaintiff in this action and am appearing pro se.
- 24 2. On **Dec.6**, I received the following documents from Defendant, **which appear**
25 **tobe invalid under 28 U.S.C. § 1447(c), Federal Rule of Civil Procedure 5,**
26 **and 28 U.S.C. § 1446(d);**
- 27 o Notice of Removal of Action Under 28 U.S.C. § 1441;
- 28 o Civil Cover Sheet;

- Certificate and Notice of Interested Parties;
- Declaration of Kristin Ingulsrud;
- Declaration of Matthew Rubin.

3. Upon review, none of these documents bear a state court stamp indicating they were actually filed with the state court.

4. Based on my assessment, this failure constitutes a procedural defect under **28 U.S.C. § 1446(d)**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: 01/21/2025

Stephen Chapman

Stephen R. Chapman
Plaintiff, Pro Per

Enclosures

1. Copies of the purportedly filed documents provided by Defendant.
2. State court records showing the absence of these documents.